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Attorneys for Defendant Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff,

v.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-06754-WHA

**DECLARATION OF GEOFFREY MOSS
IN SUPPORT OF SONOS, INC.'S
MOTION FOR LEAVE TO AMEND
INFRINGEMENT CONTENTIONS
PURSUANT TO PATENT L.R. 3-6**

Date: April 14, 2022

Time: 8:00 a.m.

Place: Courtroom 12, 19th Floor

Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Geoffrey Moss, declare as follows and would so testify under oath if called upon to do
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos’s Motion for Leave to Amend its
8 Infringement Contentions Pursuant to Patent L.R. 3-6.

9 3. On February 3, 2022, Google disclosed its proposed construction for the term
10 “playback queue” found in the asserted claims of the U.S. Patent Nos. 9,967,615 (the “’615
11 Patent”) and 10,779,033 (the “’033 Patent”).

12 4. Attached as **Exhibit 1** is a true and correct copy of excerpts from an email and the
13 attachment (Appendix A: Terms in Dispute) dated February 3, 2022 from Nima Hefazi to Cole
14 Richter.

15 5. Attached as **Exhibit 2** is a true and correct copy of excerpts from an email dated
16 February 3, 2022 from Nima Hefazi to Cole Richter, continuing the deadline to exchange expert
17 testimony.

18 6. Attached as **Exhibits 3 and 4** are true and correct copies of excerpts from Sonos’s
19 proposed amended infringement contentions for the ’615 and ’033 patents that show all of the
20 proposed changes in red-line.
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1 7. Attached as **Exhibit 5** is a true and correct copy of an email dated February 24,
2 2022, from Alyssa Caridis notifying Google's counsel of Sonos's intent to amend its infringement
3 contentions to take into account Google's new construction.

4 I declare under penalty of perjury that the foregoing is true and correct to the best of my
5 knowledge. Executed this 2nd day of March, 2022 in Los Angeles, California.

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9 _____
10 GEOFFREY MOSS
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